

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**ALVERENE BUTLER,
Plaintiff,**

v.

**ALABAMA DEPARTMENT
OF TRANSPORTATION, et al.,
Defendant.**

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Civil Case No. 2:06-CV-278-MEF

PLAINTIFF'S PROPOSED VOIR DIRE EXAMINATION

COMES NOW Plaintiff, by and through his attorneys of record, and requests the Court to examine the jury venire as to the following matters:

- 1 Does any member know R. Mitchell Alton, III or Harry A. Lyles, or any lawyer or support person who is employed by the state in Montgomery, Alabama?
- 2 Does any member know either Jay Lewis, Andy Nelms, Carol Gerard or any employee of the Law Offices of Jay Lewis, a Montgomery firm?
- 3 Has any member ever worked in the legal profession, either as a lawyer, paralegal, or any other employee of a law firm?
- 4 Is any member related to any person who works, or has worked, in the legal profession?
- 5 Have you or has any member of your family ever been employed by the Department of Transportation of Alabama? If so, when and in what capacity?
- 6 Have you or has any member of your family or any close friend ever been employed by any state agency?
7. Does any of you know any of the following persons who may testify in this trial?
 - A. Alverene Butler, Plaintiff.

- B. Rev. Al Dixon
 - C. Melvin Wynn
 - D. Kelvin Johnson
 - E. Jeff Hollingsworth
 - F. Xavier Davis
 - G. Joe McInnes
 - H. Patrick T. Jackson, also known as Todd Jackson
 - I. Russell Vaughn
 - J. Karen Stacey
 - K. Reeser Knight
 - L. Peter Smith
 - M. Aldrekia Patterson
 - N. Mark Waits
 - O. Steve Dukes
 - P. Lucy Holcombe
 - Q. Jacqueline J. Lohman
 - R. Ron Green
 - S. William F. Kelley
 - T. L. Daniel Morris, Jr., also known as "Dan Morris"
 - U. Joe McInnes
8. Is there anyone who would find it difficult to render a verdict against an agency of government or would hesitate to award money damages against an agency of government if the evidence otherwise warranted it?

9. Has any member ever worked in a human resources or personnel department?
10. Has any member ever been responsible for hiring, firing, or disciplining employees?
11. Is there any member of the venire who is simply opposed to filing lawsuits?
12. Does any member of the venire feel that too many frivolous lawsuits are filed?
13. Is any member of the venire a member of any organization that seeks to limit either lawsuits or damages awarded? Are you a supporter of any such organization?
14. Does any member of the venire believe that the jury system is “out of control” or that the right of a plaintiff to a trial by jury should be limited?
15. Is there any member who feels that a person should not be able to come to court if he feels his rights under the laws of the United States have been violated?
16. Does any member feel that, if he serves, he will not be able to render a fair verdict because of the issues or the people involved in this case?
17. Is there any member of the venire who, for any other reason not addressed, feels that he or she will be unable to serve as a juror in this case?

RESPECTFULLY SUBMITTED, this __18th day of May, 2007.

/s/ JAY LEWIS
Jay Lewis
Attorney for Plaintiff
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P.O. Box 5059
Montgomery, Alabama, 36103
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ASB-2014-E66J

CERTIFICATE OF SERVICE

I hereby certify that on the _18th_ day of May, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following parties or counsel:

R. Mitchell Alton, III
Harry A. Lyles
ALDOT
1409 Coliseum Blvd.
Montgomery, AL 36110

/s/ JAY LEWIS
Jay Lewis
Attorney for Plaintiff
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